

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
YOUNGSTOWN, OHIO

IN RE: ) CASE NO. 10-40194  
ERIC MULLENEX ) CHAPTER 13 PROCEEDINGS  
 )  
Debtor ) JUDGE Kay Woods  
 )

**OBJECTION TO NOTICE OF MORTGAGE PAYMENT CHANGE**

Now comes Eric Mullennex, Debtor, through counsel and hereby objects to the Notice of Mortgage Payment Change that was filed on January 14, 2013, and, as grounds that the \$4,306.04 that Citimortgage is claiming an arrearage amount should have been included in their Proof of Claim.

The debtor represents to the court that he has made every payment since the filing of this bankruptcy in a timely manner.

Respectfully submitted,

/s/Dann S. Timmons  
Dann S. Timmons (Ohio Reg. #0037943)  
Attorney for Debtor  
8132 Main Street, PO Box 403  
Garrettsville, OH 44231  
(330) 527-4882

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of February 2013, a copy of the foregoing Objection was served on the following by ECM/CM, postage prepaid:

U.S. Trustee (electronically)

Chapter 13 Trustee (electronically)

CitiMortgage Inc.  
Attn.: Michelle R. Garcia, Bankruptcy Specialist  
PO Box 140609  
Irving TX 75019-0609  
Sent by US certified mailing  
(Address from Proof of Claim)

Citimortgage Inc  
Attn.: Kari Ann Arnold, Bankruptcy Specialist  
PO Box 6030  
Sioux Falls, SD 57117-6030  
(address from the Notice of Mortgage Payment Change)

/s/ Dann S. Timmons  
DANN S. TIMMONS (Ohio Reg. #0037943)  
Attorney for Debtor